

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

JUSTICE FOR THE NEXT	)	
GENERATION, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	<b>Civil Action No. 1:20-cv-00998</b>
	)	
TERRY JOHNSON, et al.,	)	
	)	
Defendants.	)	

**CONSENT MOTION TO APPROVE SETTLEMENT AGREEMENT AND TO  
EXCUSE CERTAIN COUNSEL FROM APPROVAL HEARING**

Plaintiffs respectfully move this Court pursuant to Local Civil Rule 17.1 to approve the settlement agreement executed by the parties in this litigation on May 17, 2022. This Court's approval is required with respect to four minors who are plaintiffs in this litigation and referred to as M.E., Z.P., J.A., and B.A. A copy of the settlement agreement is attached as Exhibit A to this motion. Defendants do not oppose the relief sought in this motion.

As is explained in the accompanying memorandum, the settlement agreement is fair, reasonable, and in the best interests of M.E., Z.P., J.A., and B.A. The settlement agreement is the result of several weeks of intense arms' length negotiation overseen by the Court-appointed mediator, Mr. Thomas C. Duncan. The settlement's monetary terms are better than those reportedly obtained by the plaintiffs in a parallel case, *Allen v. City of Graham, et al.*, No. 1:20-cv-0997 (M.D.N.C.) both in aggregate terms and on a per-plaintiff basis. The settlement also provides for non-monetary relief that, in Plaintiffs' judgment, they

were unlikely to obtain at trial in this matter. The settlement is also fair and reasonable in light of the costs and inherent uncertainties associated with depositions, expert discovery, summary judgment, trial, and appeal. Accordingly, Plaintiffs request, and Defendants do not oppose, this Court approving the settlement agreement with respect to M.E., Z.P., J.A., and B.A. under Local Rule 17.1.

Finally, the parties request that this Court exercise its discretion under L.R. 17.1(c)(3) to excuse attorneys who were not principally involved in the negotiation of the settlement agreement from the fairness hearing that this Court is required to conduct.

Respectfully submitted, this the 23rd day of May, 2022.

Counsel for Plaintiffs:

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*\* By Special Appearance*

**CERTIFICATE OF SERVICE**

I certify that on May 23, 2022 I caused the foregoing document to be filed using the Court's CM/ECF which will electronically notify all counsel of record.

/s/ Stephen M. Medlock

Stephen M. Medlock  
Counsel for Plaintiffs